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April 27, 1998

**RECEIVED**

APR 27 1998

**VIA HAND DELIVERY**

Ms. Magalie Roman Salas  
Secretary, Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Petition for Rule Making  
Amendment of Section 73.622(b)  
Digital Television Table of Allotments  
Kingston, New York

Dear Ms. Salas:

On April 20, 1998, WRNN-TV Associates Limited Partnership, licensee of Station WRNN-TV, NTSC Channel 62/DTV Channel 21, Kingston, New York, filed a Petition for Rule Making to amend the DTV Table of Allotments by substituting DTV Channel 48 for DTV Channel 21 at Kingston. A copy of the Technical Narrative, rather than the original, was provided. We now provide the original copy of the Technical Narrative.

Please contact the undersigned if you have any questions.

Sincerely yours,

  
Ann K. Ford  
Michael Ruger

Enclosure

cc: John Karousos, Allocations Branch

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TECHNICAL EXHIBIT  
PREPARED ON BEHALF OF  
WRNN-TV ASOCIATES LIMITED PARTNERSHIP  
IN SUPPORT OF A PROPOSAL  
TO MODIFY THE DTV ALLOTMENT OF WRNN

**RECEIVED**

APR 27 1998

Technical Narrative

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

This technical narrative and associated exhibits have been prepared on behalf of WRNN-TV Associates Limited Partnership ("WRNN") in support of its proposal to modify the DTV allotment of WRNN.

WRNN is the licensee of full-power TV station WRNN at Kingston, New York (BLCT-851224KF). Station WRNN currently operates on UHF TV channel 62 (758-764 MHz) with a directional antenna maximum ERP of 5000 kW (37 dBk) and an antenna height above average terrain (HAAT) of 591 meters. In the Memorandum, Opinion and Order (MO&O) concerning reconsideration and clarification of the 6th Report and Order (6th R&O) in MM Docket No. 87-268, which concerns implementation of digital television (DTV), station WRNN was allotted channel 21 for its DTV allotment with an ERP of 98 kW and an antenna HAAT of 591 meters. It is proposed to modify WRNN's DTV allotment to propose channel 48 (674-680 MHz) in lieu of channel 21. It is also proposed to relocate the transmitter site of WRNN from its current location to a location on Beacon Mountain. In support of this, it is demonstrated that channel 48 appears to be available as an alternate DTV channel in the Kingston area for WRNN.

WRNN DTV Operation - Current Site

The FCC authorized channel 21 for WRNN's DTV operation with a directional antenna maximum ERP of 98 kW and an HAAT of 591 meters. The FCC estimates the current

NTSC operation provides service to 1,456,000 persons within 15,913 square kilometers, and the proposed DTV operation will provide interference-free service to 1,732,000 persons within 18,233 square kilometers. A DTV/NTSC area match of 99 percent is also indicated. These facilities would essentially replicate the DTV coverage authorized for channel 21. Figure 1 contains a separation study for DTV channel 21.

Interference studies were conducted for a DTV operation on channel 21 using the procedures outlined in the FCC's 6th R&O, the recent MO&O, and OET-69 bulletin. This includes use of the Longley-Rice propagation model and a 3 second digitized terrain database. This is basically the program used by the FCC to calculate service and interference in developing the DTV allotment table. The studies considered interference "caused" and "received". The results are tabulated below.

WRNN DTV Channel 21 (FCC) - Interference Caused				
Station Interfered With	Interference Area			
	FCC Service Population	Total Interference Population	Unique Interference Population	Unique Interference - % of Total Pop. Within Service Area
WHMT, NTSC-17, Schenectady, NY	1,155,000	91	91	0.01
WTXX, NTSC-20, Waterbury, CT	4,039,000	12,150	4,108	0.11
WLIW, NTSC-21, Garden City, NY	11,134,000	848,889	58,545	0.53
DWSBE, DTV-21, Providence, RI	2,351,000	47	0	0
WNBU, NTSC-21, Concord, NH	1,880,000	988	219	0.01
WWLP, NTSC-22, Springfield, MA	2,079,000	730	210	0.01
WXXA, NTSC-23, Albany, NY	1,162,000	115	24	0.002
<b>Total</b>		<b>863,010</b>	<b>63,197</b>	--

WRNN DTV Channel 21 (FCC) - Interference Received		
Station Causing Interference	Interference Area	
	Unmasked 1990 Census Population	% of Total Population Within Grade B/Noise Limited Contour
WTXX, NTSC-20, Waterbury, CT	87,806	5.1
WLIW, NTSC-21, Garden City, NY	393,505	18.45
DWSBE, DTV-21, Providence, RI	26,686	1.25
WNBU, NTSC-21, Concord, NH	16,289	0.76
WHP-TV, NTSC-21, Harrisburg, PA	5,119	0.24
WWLP, NTSC-22, Springfield, MA	1,669	0.08
DWLIW, NTSC-22, Garden City, NY	756	0.04
<b>Total (duplicated areas considered)</b>	<b>531,830</b>	<b>--</b>
<b>Total (duplicated areas not considered)</b>	<b>432,191</b>	<b>20.3</b>

WRNN Proposed Ch. 48 DTV Operation - Beacon Mountain Site

A hypothetical channel 48 DTV operation was presumed from the Beacon Mountain site located 67.5 km (42.0 miles) south of the current site. FM station WSPK on channel 284B (104.7 MHz) at Poughkeepsie, NY currently operates from this location with an antenna radiation center height above mean sea level (RCAMSL) of 504 meters and an antenna radiation center height above average terrain of (HAAT) of 381 meters (1250 feet). Therefore, a nondirectional ERP of 200 kW and an HAAT of 381 meters was used for the proposed channel 48 operation from Beacon Mountain. The noise-limited contour (39.2 dBu) would contain a population of 10,593,146 persons. Figure 1 contains a separation study for DTV channel 48. The results of the interference studies are summarized below.

**du Treil, Lundin & Rackley, Inc.**

Consulting Engineers

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Kingston, New York

WRNN DTV Channel 48 Beacon Mountain Site (Proposed) - Interference Caused				
Station Interfered With	Interference Area			
	FCC Service Population	Total Interference Population	Unique Interference Population	Unique Interference - % of Total Pop. Within Service Area
WXTV, NTSC-41, Paterson, NJ	16,233,000	134	134	0.0008
WNJU, NTSC-47, Linden, NJ	16,110,000	15,244	14,051	0.09
DWYDN, DTV-47, Worcester, MA	3,870,000	75	75	0.002
WYDN, NTSC-48, Worcester, MA	3,643,000	72,588	32,680	0.90**
WEDW, NTSC-49, Bridgeport, CT	3,156,000	41,068	7,040	0.22**
WGTW, NTSC-48, Burlington, NJ	6,439,000	73,117	5,378	0.08
WNJN, NTSC-50, Montclair, NJ	15,296,000	6,885	5,672	0.04
<b>Total</b>	<b>--</b>	<b>209,111</b>	<b>65,030</b>	<b>--</b>

\*\*Note: The FCC's DTV allotment table indicates that WYDN will receive new interference to 13.9 percent of the population within its existing NTSC service area and WEDW will receive interference to 10.2 percent of the population within its existing NTSC service area. Under the DTV maximization criteria, no new interference can be caused to any station currently receiving interference to 10 percent of its existing service area. Preliminary studies indicate that use of a directional antenna would permit reduction of the interference to "de minimus" levels in the direction of WYDN (63° true) and WEDW (110° True).

WRNN DTV Channel 48 Beacon Mountain Site (Proposed) - Interference Received		
Station Causing Interference	Interference Area	
	Unmasked 1990 Census Population	% of Total Population Within Grade B/Noise Limited Contour
WNJU, NTSC-47, Linden, NJ	391,094	3.7
WGTW, NTSC-48, Burlington, NJ	270,017	2.6
WYDN, NTSC-48, Worcester, MA	461,714	4.4
WEDW, NTSC-49, Bridgeport, CT	107,819	1.0
<b>Total (duplicated areas considered)</b>	<b>1,230,644</b>	<b>--</b>
<b>Total (duplicated areas not considered)</b>	<b>856,303</b>	<b>8.1</b>

DTV operation from the Beacon Mountain site will comply with the city coverage provisions of Section 73.625(a).

Summary

In summary, WRNN requests that the FCC consider modification of WRNN's DTV allotment to specify channel 48 and also permit relocation of the transmitter site of WRNN from its current location to a location on Beacon Mountain.

*W. Jeffrey Reynolds*  
W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.  
240 North Washington Blvd.  
Suite 700  
Sarasota, Florida 34236

April 13, 1998

DTV -> TV Separation Study

Job Title : **WRNN DTV Ch. 21 - Current Site** Separation Buffer 50 km  
 Zone : 1 FCC TV DB Date : 03/27/98  
 Channel 21 (512-518 MHz) Coordinates : 42-05-06 74-06-00

Call Status	City St	Channel FCC File No.	ERP(kW) Zone	Latitude HAAT(m)	Bear. Longitude	Dist. True (km)	Req. (km)
<hr/>							
LMRS	NEW YORK/NORTHEAST NJ	14(o)	0	40-45-06 73-59-39	176.6	148.35 0.00	0.0 LMRS
LAND MOBILE CHANNEL ONLY							
WMHT	SCHENECTADY NY	*17(+) BLET-331	2630 I	42-38-13 74-00-06	7.5 299	61.85 -18.65	24.1/80.5 SHORT
ALLOCATED TO ALBANY-SCHENECTADY, NY.							
WHCTV	HARTFORD CT	18(-) BLCT-870304KI	3160 I	41-46-30 72-48-04	107.4 32.61	113.11	24.1/80.5 CLEAR
APP	HARTFORD CT	18(-) BPCT-831202KF	5000 I	41-45-39 72-48-08	108.1 33.03	113.53	24.1/80.5 CLEAR
MX WITH RENEWAL OF WHCT-TV CH 18, HARTFORD, CT.							
NEW	HARTFORD CT	18(-) BPCT-890301KK	158 I	41-45-39 72-48-08	108.1 33.03	113.53	24.1/80.5 CLEAR
MX WITH RENEWAL OF WHCT-TV, CH 18 HARTFORD, CT.							
WCDCTV	ADAMS MA	19(o) BLCT-810105KE	447 I	42-38-14 73-10-07	50.9 637	98.25 17.75	24.1/80.5 CLEAR
LMRS	NEW YORK NY	19(o)	0	40-45-06 73-59-39	176.6	148.35 0.00	0.0 LMRS
PROPOSED LAND MOBILE CHANNEL, DOCKET 85-172							
WTXX	WATERBURY CT	20(o) BLCT-820428KE	2240 I	41-31-04 73-01-07	124.8 366	109.77 3.77	12.0/106.0 CLOSE
WUTR	UTICA NY	20(+) BLCT-1970	912 I	43-08-43 75-10-35	323.6 244	147.22 41.22	12.0/106.0 CLEAR
WUTR	UTICA NY	20(+) BPCT-790426KG	1150 I	43-08-43 75-10-35	323.6 244	147.22 41.22	12.0/106.0 CLEAR
WLIW	GARDEN CITY NY	*21(-) BLET-790131LQ	3160 I	40-47-19 73-27-09	159.3 122	153.82 -63.48	217.3 SHORT
WNBU	CONCORD NH	21(+) BPCT-950215KF	1860 I	43-11-04 71-19-12	60.8 320	258.69 41.39	217.3 CLEAR
WNBU	CONCORD NH	21(+) BLCT-840425KF	1860 I	43-11-04 71-19-12	60.8 344	258.69 41.39	217.3 CLEAR
WWLP	SPRINGFIELD MA	22(o) BLCT-841128KJ	3390 DA I	42-05-05 72-42-14	89.5 268	115.53 9.53	12.0/106.0 CLOSE

Call Status	City	Channel	ERP(kW)	Latitude	Bear.	Dist.	Req.	
	St FCC File No.	Zone	HAAT(m)	Longitude	True	(km)	(km)	
WWLP APP	SPRINGFIELD MA	22(o) BMPCT-930826KE	4470 I 267	42-05-05 72-42-14	89.5 9.53	115.53	12.0/106.0 CLOSE	
DA TABULATIONS UNAVAILABLE.								
WXXATV	ALBANY	23(-)	3020	DA	42-37-01	6.9	59.53	24.1/80.5
LIC	NY	BLCT-820810KG	I 366		74-00-46		<b>-20.97</b>	<b>SHORT</b>
ALLOCATED TO ALBANY-SCHENECTADY, NY.								
WEDH LIC	HARTFORD CT	*24(o) BLET-341	813 I 262	41-46-27 72-48-20	107.5 32.29	112.79	24.1/80.5 CLEAR	
WNYETV LIC	NEW YORK NY	*25(o) BLET-920220KG	2450 I 395	40-44-54 73-59-10	176.3 68.27	148.77	24.1/80.5 CLEAR	
LMRS	NEW YORK NY	28(o)		40-45-06 73-59-39	176.6 0.00	148.35	0.0	
PROPOSED LAND MOBILE CHANNEL, DOCKET 85-172								
NEW APP	SCHENECTADY NY	*29(+) BPET-960724KU	617. I 229	42-47-08 73-37-44	26.2 6.45	86.95	24.1/80.5 CLOSE	
REQUESTS A WAIVER OF FREEZE; ALLOCATED TO ALBANY-SCHENECTADY, N								
NORTH ALLOC. ADAMS	M A	*35(o)		42-41-53 73-06-40	49.7 25.66	106.16	24.1/80.5 CLEAR	
I 0								

\*\* End of TV Separation Study for Channel 21 \*\*

#### DTV ->DTV Separation Study

Job Title :WRNN DTV Ch. 21 - Current Site                      Separation Buffer 50 km  
 Zone : 1    FCC DTV DB Date: 03/16/98  
 Channel 21 (512-518 MHz)                                      Coordinates : 42-05-06 74-06-00

Call Status	City	Channel	ERP(kW)	Latitude	Bear.	Dist.	Req.
	St FCC File No.	Zone	HAAT(m)	Longitude	True	(km)	(km)
DWRNNTV DTVALT	KINGSTON NY	21 I	98.00 591.	42-05-06 74-06-00	0.0	0.00	
DWSBETV DTVALT	PROVIDENCE RI	21 I	50.00 182.	41-48-18 71-28-24	97.3 220.02 23.72		196.3 CLEAR
DWWTI DTVALT	WATERTOWN NY	21 II	50.00 387.	43-52-47 75-43-11	327.1 239.18 42.88		196.3 CLEAR

\*\* End of DTV Separation Study for Channel 21 \*\*

**TV -> TV Separation Study**

Job Title : **WRNN Ch. 48 - Beacon Mountain Site** Separation Buffer 100 km  
 Zone : 1 FCC TV DB Date : 04/10/98  
 Channel 48 (674-680 MHz) Coordinates : 41-29-19 73-56-52

Call Status	City St	Channel FCC File No.	ERP(kW) Zone	Latitude HAAT(m)	Bear. Longitude	Dist. True (km)	Req. (km)
LMRS	NEW YORK NY	-	33(o) 0	40-45-06 73-59-39	182.7	81.94 0.00	0.0 LMRS
PROPOSED LAND MOBILE CHANNEL, DOCKET 85-172							
WFXV LIC	UTICA NY	BLCT-861210KG	33(o) I 42.7 197	42-02-14 75-26-40	324.9	211.76 91.86	119.9 CLEAR
WFXV CP	UTICA NY	BPCT-960111LM	33(o) I 851. 193	43-02-14 75-26-40	324.9	211.76 91.86	119.9 CLEAR
LMRS	NEW YORK NY	-	34(o) 0	40-45-06 73-59-39	182.7	81.94 0.00	0.0 LMRS
PROPOSED LAND MOBILE CHANNEL, DOCKET 85-172							
WIVT APP	BINGHAMTON NY	BPCT-970807KK	34(o) I 2820 283	42-03-39 75-56-36	291.7	177.69 81.99	95.7 CLEAR
WIVT LIC	BINGHAMTON NY	BLCT-871110KV	34(o) I 1480 281	42-03-39 75-56-36	291.7	177.69 81.99	95.7 CLEAR
WGGBTV LIC	SPRINGFIELD MA	BLCT-871117KE	40(o) I 4270 322	42-14-30 72-38-57	51.7	136.47 105.07	31.4 CLEAR
WXTV LIC	PATERSON NJ	BLCT-920218KE	41(-) I 2340 421	40-44-54 73-59-10	182.2	82.28 <b>-13.42</b>	95.7 SHORT
WIPX LIC	BRIDGEPORT CT	BLCT-871009KE	43(-) I 2290 156	41-21-43 73-06-48	101.2	71.17 39.77	31.4 CLEAR
WMHQ LIC	SCHENECTADY NY	BLCT-850114KJ	45(o) I 2950 338	42-37-37 74-00-40	357.7	126.56 95.16	31.4 CLEAR
ALLOCATED TO ALBANY-SCHENECTADY, NY.							
ALLOC. NY	ALBANY-SCHENECTADY	-	45(o) I 0	42-39-01 73-45-01	7.1	130.07 98.67	31.4 CLEAR
ALLOCATION USED SCHENECTADY, NY.							
WNJU LIC	LINDEN NJ	BLCT-800423KE	47(+) I 4570 460	40-42-43 74-00-49	183.7	86.44 <b>-1.26</b>	87.7 SHORT

Call Status	City	Channel	ERP (kW)	Latitude	Bear.	Dist.	Req.
		FCC File No.	Zone	HAAT(m)	Longitude	True	(km)
WYDN CP MOD MA	WORCESTER	*48(+) BMPET-920220KF	I 250	5000	42-08-32	62.5 160.56	248.6
APP					72-13-28	<b>-88.04</b>	<b>SHORT</b>
WYDN APP	WORCESTER	*48(+) BMPET-930914KL	I 192	2000 DA	42-08-32	62.5 160.56	248.6
					72-13-28	<b>-88.04</b>	<b>SHORT</b>
WGTV APP	BURLINGTON	48(-) BPCT-950706KF	I 364	5000	40-02-49	214.5 193.54	248.6
					75-14-08	<b>-55.06</b>	<b>SHORT</b>
WGTV CP	BURLINGTON	48(-) BPCT-840104KL	I 335	2340	40-02-36	214.6 194.20	248.6
					75-14-33	<b>-54.40</b>	<b>SHORT</b>
WYDC LIC	CORNING	48(+) BLCT-940920KE	I 166	12 DA	42-09-43	287.3 267.37	248.6
					77-02-15	18.77	CLEAR
WEDW LIC	BRIDGEPORT	*49(-) BLET-870908KE	I 222	1950 DA	41-16-43	109.9 67.90	87.7
					73-11-08	<b>-19.80</b>	<b>SHORT</b>
WNJN LIC	MONTCLAIR	*50(+) BLET-860805KG	I 243	2090	40-51-53	197.1 72.48	31.4
					74-12-03	41.08	CLEAR
WNJN CP	MONTCLAIR	*50(+) BPET-891219KE	I 243	5000	40-51-53	197.1 72.48	31.4
					74-12-03	41.08	CLEAR
	PITTSFIELD	51(+) ALLOC. MA -	I 0	42-26-48	28.1 121.00	31.4	
					73-15-12	89.60	CLEAR
NEW APP	PITTSFIELD	51(+) MA BPCT-960724LI	I 345	5000	42-32-42	24.7 129.52	31.4
					73-17-09	98.12	CLEAR
	REQUESTS A WAIVER OF FREEZE						
WNJT1 CP	CLINTON	52(o) NJ BPUB-880614ND	I 0	0.6	40-41-43	223.1 120.17	31.4
					74-55-13	88.77	CLEAR
WLNY LIC	RIVERHEAD	55(+) NY BLCT-850429KJ	I 194	5000 DA	40-53-50	126.9 108.69	95.7
					72-54-56	12.99	CLOSE
WYPX LIC	AMSTERDAM	55(o) NY BLCT-871221KG	I 223	5000 DA	42-59-05	353.5 167.30	95.7
					74-10-49	71.60	CLEAR
WCBS-DT CP	NEW YORK	56 NY BPCDT-971103KE	I 397	349	40-44-54	182.2 82.28	31.4
					73-59-10	50.88	CLEAR
	ERP AS SHOWN ON CP.						
WRNNNTV LIC	KINGSTON	62(+) NY BLCT-851224KF	I 591	5000 DA	42-05-06	349.3 67.45	95.7
					74-06-00	<b>-28.25</b>	<b>SHORT</b>
WMBCTV APP	NEWTON	63(o) NJ BPCT-980126KH	I 348	5000 DA	41-00-43	225.7 75.64	119.9
					74-35-32	<b>-44.26</b>	<b>SHORT</b>
WMBCTV LIC	NEWTON	63(o) NJ BLCT-940913KE	I 223	2190	41-00-36	225.7 75.91	119.9
					74-35-39	<b>-43.99</b>	<b>SHORT</b>

\*\* End of TV Separation Study for Channel 48 \*\*

TV ->DTV Separation Study

Job Title :WRNN Ch. 48 - Beacon Mountain Site      Separation Buffer 100 km  
Zone : 1    FCC DTV DB Date: 03/16/98  
Channel 48 (674-680 MHz)                                  Coordinates : 41-29-19 73-56-52

Call Status	City St	Channel FCC File No.	ERP(kW) Zone	Latitude HAAT(m)	Bear. Longitude	Dist. True	(km)	Req. (km)
DWPIX DTVALT	NEW YORK NY	33	116.80 I	40-42-43 506.	183.7 74-00-49	86.43 5.93	24.1/80.5 CLOSE	
DWFBSB DTVALT	HARTFORD CT	33	1000.0 I	41-46-30 276.	71.1 72-48-20	100.35 19.85	24.1/80.5 CLEAR	
DWMHT DTVALT	SCHENECTADY NY	34	156.40 I	42-38-13 299.	358.0 74-00-06	127.63 47.13	24.1/80.5 CLEAR	
DWTWS DTVALT	NEW LONDON CT	34	116.70 I	41-25-05 381.	92.5 72-11-55	146.37 65.87	24.1/80.5 CLEAR	
DWXTV DTVALT	PATERSON NJ	40	69.10 I	40-44-54 421.	182.2 73-59-10	82.27 1.77	24.1/80.5 CLOSE	
DWNYW DTVALT	NEW YORK NY	44	224.80 I	40-42-43 515.	183.7 74-00-49	86.43 5.93	24.1/80.5 CLOSE	
DWABCTV DTVALT	NEW YORK NY	45	164.30 I	40-42-43 491.	183.7 74-00-49	86.43 5.93	24.1/80.5 CLOSE	
DWEDN DTVALT	NORWICH CT	45	50.00 I	41-31-11 207.	88.1 72-10-04	148.66 68.16	24.1/80.5 CLEAR	
DWHCTTV DTVALT	HARTFORD CT	46	219.50 I	41-46-30 299.	71.1 72-48-04	100.71 20.21	24.1/80.5 CLEAR	
DWFMZTV DTVALT	ALLENTOWN PA	46	50.00 I	40-33-54 313.	231.1 75-26-26	162.12 81.62	24.1/80.5 CLEAR	
DWYDN DTVALT	WORCESTER MA	47	101.00 I	42-08-32 398.	62.5 72-13-28	160.55 54.55	12.0/106.0 CLEAR	
DWNEPTV DTVALT	SCRANTON PA	49	73.50 I	41-10-58 506.	258.7 75-52-21	164.66 58.66	12.0/106.0 CLEAR	
DWOCD DTVALT	AMSTERDAM NY	50	136.80 I	42-59-05 223.	353.5 74-10-49	167.29 86.79	24.1/80.5 CLEAR	
DWNJN DTVALT	MONTCLAIR NJ	51	179.20 I	40-51-53 243.	197.1 74-12-03	72.47 <b>-8.03</b>	24.1/80.5 SHORT	
DWEDW DTVALT	BRIDGEPORT CT	52	50.00 I	41-16-43 222.	109.9 73-11-08	67.89 <b>-12.61</b>	24.1/80.5 SHORT	
DWCBSTV DTVALT	NEW YORK NY	56	364.60 I	40-42-43 482.	183.7 74-00-49	86.43 5.93	24.1/80.5 CLOSE	

\*\* End of DTV Separation Study for Channel 48 \*\*